



DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
WASHINGTON, D.C. 20224

OFFICE OF THE CHIEF COUNSEL

July 23, 2020

Number: **2020-0021**  
Release Date: 9/25/2020

CONEX-114030-20

UIL: 401.06-00

The Honorable Vern Buchanan  
Member, U.S. House of Representatives  
111 South Orange Avenue, Suite 202W  
Sarasota, FL 34236

Attention:

Dear Representative Buchanan:

I am responding to your inquiry dated June 16, 2020, on behalf of your constituent, . explained he received his required minimum distribution (RMD) in January 2020 and asked if he could roll over the RMD distribution back to his IRA.

Section 2203 of the CARES Act of March 27, 2020, waived all RMDs for the 2020 calendar year. Therefore, individuals can roll over any RMD paid from an IRA in 2020.

Generally, an IRA owner has 60 days from the IRA distribution to roll over that amount to an IRA or other eligible retirement plan. On June 23, 2020, we issued Notice 2020-51, to give guidance related to Section 2203 of the CARES Act. Notice 2020-51 extended the deadline to roll over any 2020 RMD paid before July 2 (including those paid in January 2020) to August 31, 2020. However, the normal 60-day deadline still applies to any 2020 RMDs paid on or after July 2, 2020.

In addition, if individuals repay amounts equal to the 2020 RMD into the IRA that distributed the RMD, the IRS will not treat that repayment as a rollover for purposes of the "one rollover per year" rule.

For your convenience, I have enclosed a copy of Notice 2020-51.

I hope this information is helpful. If you have any additional questions, please contact me at \_\_\_\_\_ or \_\_\_\_\_ at \_\_\_\_\_.

Sincerely,

Laura B. Warshawsky  
Branch Chief, Qualified Plans Branch 1  
(Employee Benefits, Exempt Organizations,  
and Employment Taxes)

Enclosure